

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	
)	IND. NO. 1:18-CR- 029
GLORIA OKOLIE)	
)	
PAUL WILSON AISOSA)	

**MOTION FOR LEAVE AND
GOVERNMENT'S NOTICE OF INTENT
TO OFFER PROOF OF OTHER CRIMES, WRONGS, AND ACTS**

MOTION FOR LEAVE

COMES NOW the United States of America by and through Bobby L. Christine, United States Attorney for the Southern District of Georgia, and the undersigned Assistant United States Attorney, and requests permission to file late this Notice of Intent to Offer Proof of Other Wrongs pursuant to Fed.R.Evid. 404(b).

Pursuant to Local Rule 16.2, the Government should file, not later than 20 day after arraignment, its notice to present other wrongs. The defendants were arraigned, 28 days ago, on June 26, 2018. The Government has had discussions with counsel representing both defendants and has discussed potential non-trial resolutions regarding both defendants. However, out of an abundance of caution, the Government seeks leave to file the instant notice. The materials which form the basis of the 404(b) evidence were provided at arraignment.

NOTICE OF INTENT TO OFFER PROOF

Pursuant to Local Rule 16.2, the Government hereby provides notice that it intends to offer into evidence at the trial of the defendants, other crimes, wrongs and acts through Fed.R.Evid. 404(b), of complaints to the FBI's Internet Crime Complaint Center (IC3) as follows:

1. Complaint made on 2/14/2011 against Paul Aisosa, Vault Networks, Inc;
2. Complaint made on 11/18/2011 against Elevation Consultants & Investments, Inc;
3. Complaint made on 3/13/2014 against Elevation Auto Service;
4. Complaint made on 8/11/2015 against G.C. Investment and Logistics;
5. Complaint made on 9/2/2015 against PE & A Marketing and Management Services, LLC;
6. Complaint made on 9/17/2015 involving 1234trot5@gmail.com;
7. Complaint made on 7/25/2016 against [sic]E & A Marketing & Management Service, LLC;
8. Complaint made on 8/9/2016 against TCGI Services Inc.;
9. Complaint made on 12/7/2016 against TCGI Services Inc.
10. Complaint made on 1/10/2017 against TCGI Services Inc.
11. Complaint made on 1/17/2017 against TCGI Services Inc.;
12. Complaint made on 10/3/2017 against PE & A Marketing &Mgt;
13. Complaint made on 1/19/2018 against TCGI Services Inc.

Copies of the complaints have been previously provided.

Federal Rule of Evidence 404(b) provides that evidence of other crimes, wrongs, or acts is not admissible to prove the character of the accused to show conformity therewith. Evidence, however, which proves intent, preparation, plan, knowledge, identity, or absence of mistake or accident may be admissible in certain circumstances.

In addition, the production to the Defendants in discovery of any evidence of prior wrongs, crimes, or acts should be taken by the Defendants as an announcement of the government's intention to use such evidence at trial. Because opinions of the parties often differ as to whether particular evidence goes to proof of matters inextricably intertwined, predicate, or part of the transactions charged, or rather constitutes extrinsic proof of intent, motive, plan, etc., under Fed. R. Evid. 404(b), the Defendants should consider that the government intends to use all information provided in discovery to the extent any rule of evidence permits, absent an express indication to the contrary. In other words, the provision of any information by the government in discovery, to the extent that such information could be admitted at trial under the aegis of Fed. R. Evid. 404(b), should be considered notice to the Defendants of the government's intention to use such Rule 404(b) evidence. Should Defendants wish to bar the introduction in the government's case-in-chief of any evidence disclosed in discovery, a pretrial ruling should be sought *in limine*, or a stipulation obtained from the government.

Respectfully submitted, this 24th day of August, 2018.

BOBBY CHRITINE
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

This is to certify that I have on this day served all parties in this case in accordance with the notice of electronic filing ("NEF") which was generated as a result of electronic filing in this Court.

This 24th Day of July, 2018.

BOBBY L. CHRISTINE
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